

Exhibit A

From: [David Smith](#)
To: [Holly Smith](#); "[Hugg, Jonathan W.](#)"
Cc: [Michael Donohue](#); [Gary Seitz](#); [Callahan, Kevin \(USTP\)](#); [Robert Krandel](#); [Collura, Elizabeth F.](#); [Baker, Frederic \(USTP\)](#)
Subject: RE: Portnoy Mediation
Date: Thursday, March 17, 2016 3:21:47 PM
Sensitivity: Confidential

Confirmed.

From: Holly Smith [mailto:hsmith@gsbblaw.com]
Sent: Thursday, March 17, 2016 12:04 PM
To: David Smith; 'Hugg, Jonathan W.'
Cc: Michael Donohue; Gary Seitz; Callahan, Kevin (USTP); Robert Krandel; Collura, Elizabeth F.; Baker, Frederic (USTP)
Subject: RE: Portnoy Mediation
Sensitivity: Confidential

David – at the risk of sounding redundant, pending finalization of the stipulation, can you respond to this email confirming that the deadline to object to the Debtor's amended exemptions (currently tomorrow), is extended pending the outcome of the mediation. Thank you.



Holly E. Smith
Attorney at Law
Gellert Scali Busenkell & Brown, LLC

hsmith@gsbblaw.com | P: 215-238-0012 | F: 215-238-0016

The Curtis Center, 601 Walnut Street, Suite 470 West
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From: David Smith [mailto:dsmith@skhlaw.com]
Sent: Tuesday, March 15, 2016 11:47 AM
To: Holly Smith <hsmith@gsbblaw.com>; 'Hugg, Jonathan W.' <jhugg@clarkhill.com>
Cc: Michael Donohue <mdonohue@skhlaw.com>; Gary Seitz <gseitz@gsbblaw.com>; Callahan,

Kevin (USTP) <Kevin.P.Callahan@usdoj.gov>; Robert Krandel <rkrandel@fmglaw.com>; Collura, Elizabeth F. <ecollura@clarkhill.com>

Subject: RE: Portnoy Mediation

Sensitivity: Confidential

I am attaching a revised consent order that incorporates the comments of others. For the sake of clarity, although I used Holly's version of the document and incorporated the changes of others, all of the changes to my original version appear in redline or blue line. Since we're obviously dealing with multiple parties, I would ask that you confirm by a reply to all e-mail if the attached document is acceptable. If you have any comments, please first call me to discuss so that we can try to agree on mutually acceptable language prior to generating another version of the document. Also, if there are any issues between parties other than Mr. Portnoy, I'd ask that you first reach out to the party affected by your comment, again with the hope that any final comments can be agreed to by the parties affected prior to sending it to the group as a whole.

From: Holly Smith [<mailto:hsmith@gsbblaw.com>]

Sent: Wednesday, March 09, 2016 4:41 PM

To: David Smith; 'Hugg, Jonathan W.'

Cc: Michael Donohue; Gary Seitz; Callahan, Kevin (USTP); Robert Krandel; Collura, Elizabeth F.

Subject: RE: Portnoy Mediation

Sensitivity: Confidential

Sorry – I made another revision, see attached.



Holly E. Smith

Attorney at Law

Gellert Scali Busenkell & Brown, LLC

hsmith@gsbblaw.com | P: 215-238-0012 | F: 215-238-0016

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From: Holly Smith

Sent: Wednesday, March 09, 2016 4:31 PM

To: 'David Smith' <dsmith@skhlaw.com>; 'Hugg, Jonathan W.' <jhugg@clarkhill.com>

Cc: Michael Donohue <mdonohue@skhlaw.com>; Gary Seitz <gseitz@gsbblaw.com>; Callahan, Kevin (USTP) <Kevin.P.Callahan@usdoj.gov>; Robert Krandel <rkrandel@fmglaw.com>; Collura, Elizabeth F. <ecollura@clarkhill.com>

Subject: RE: Portnoy Mediation

Sensitivity: Confidential

Attached is a redline with proposed revisions on behalf of the Trustee.



Holly E. Smith

Attorney at Law

Gellert Scali Busenkell & Brown, LLC

hsmith@gsbblaw.com | P: 215-238-0012 | F: 215-238-0016

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From: David Smith [<mailto:dsmith@skhlaw.com>]

Sent: Friday, March 04, 2016 3:41 PM

To: 'Hugg, Jonathan W.' <jhugg@clarkhill.com>

Cc: Michael Donohue <mdonohue@skhlaw.com>; Gary Seitz <gseitz@gsbblaw.com>; Holly Smith <hsmith@gsbblaw.com>; Callahan, Kevin (USTP) <Kevin.P.Callahan@usdoj.gov>; Robert Krandel <rkrandel@fmglaw.com>; Collura, Elizabeth F. <ecollura@clarkhill.com>

Subject: RE: Portnoy Mediation

Sensitivity: Confidential

Please see the attached draft of a stipulation and order to effect a referral of all matters to mediation before Judge Chan. Any proposed changes are probably best done in redline and returned to me so that I can send out a final clean copy for signature and filing.

Thanks.

From: Hugg, Jonathan W. [<mailto:jhugg@clarkhill.com>]
Sent: Thursday, February 25, 2016 2:51 PM
To: David Smith
Cc: Michael Donohue; Gary F. Seitz (gseitz@gsbblaw.com); Holly Smith <hsmith@gsbblaw.com> (hsmith@gsbblaw.com); Callahan, Kevin (USTP); Robert Krandel; Collura, Elizabeth F.
Subject: Portnoy Mediation
Importance: High
Sensitivity: Confidential

David:

Please send a letter to Judge Coleman requesting a referral of the two adversaries to Judge Chan for mediation.

Thank you.

Jonathan

Jonathan W. Hugg

Member

CLARK HILL PLC

One Commerce Square | 2005 Market Street, Suite 1000 | Philadelphia, PA 19103

Direct Dial: 215.640.8547 | Fax: 215.640.8501 | Cell: 267.236.9477

jhugg@clarkhill.com | www.clarkhill.com

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